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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Federal-State Joint Board on)
Universal Service)
Proposed Revision of Maximum)
Collection Amounts for Schools and)
Libraries and Rural Health Care)
Providers, Public Notice, DA 98-872)

CC Docket No. 96-45

COMMENTS OF SPRINT CORPORATION

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May 22, 1998

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Providers, Public Notice, DA 98-872)	

COMMENTS OF SPRINT CORPORATION¹

Sprint does not oppose the Commission's proposal, in the referenced public notice, to reduce the 1998 funding caps for the schools and libraries and rural health care programs so that the increase in second-half 1998 funding for the schools and libraries program would be offset, in the aggregate, by reductions in access charges that are expected to occur on July 1, 1998.

The Commission's proposal to lower the cap for schools and libraries funding in 1998 (and also to lower the cap for funding support for rural health care facilities) appears to be motivated by a desire to prevent any net increases in costs for the IXCs attributable to Commission-mandated programs such as the universal service funding programs, and Commission-regulated charges such as switched access charges. Nonetheless, the Commission should bear in mind that its proposal would still increase the IXCs' total universal service funding obligations (both direct and indirect)

¹ Sprint is filing a copy of these comments on diskette.

from current levels. Each IXC has the right, in the first instance, to determine how best to recover this (and every other) element of its costs through the rates it charges its customers. Moreover, the Commission-mandated changes in the structure of switched access charges occurring on July 1 will have different impacts on different long distance carriers. Indeed, depending on the mix of switched access services they buy, some long distance carriers may be subject to an overall increase in their switched access costs on July 1, in addition to increases in their USF funding obligations.

Rather than adding to the amount of universal service funding that IXCs must shoulder implicitly through access charges, as the Commission's second-half 1998 funding proposal would entail,² it is time for the Commission to pay heed to the directive of §254 that USF should be funded explicitly, rather than through implicit subsidies such as those that continue to exist in access charges. The Commission must remove all such subsidies from access, and decide upon the level of support needed for all its universal service programs, if the benefits of the 1996 Act (especially local competition) are ever to be realized.

This problem is exacerbated by the Commission's determination to fund the high cost and low income programs only from interstate and international revenues, and to allow the local exchange carriers to pass on their contributions (including the schools and libraries and rural health care programs, which are funded on the basis of intrastate revenues as well) back to the long distance carriers through an increase in access charges. The effect of these actions is to saddle the long distance carriers with over 95% of the

² Any increase in USF funding over current levels results in an increase in access charges, since the LECs are allowed to pass most of their contributions through to IXCs as upward adjustments to access charges.

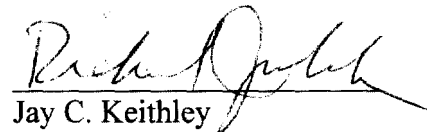
Sprint Corporation
Comments - CC Docket No. 96-45
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LECs' contributions and with 90% of the total costs of USF support. If instead, USF funding were accomplished through uniform end-user surcharges based on total end-user revenues (as Sprint has repeatedly urged in this docket), far less of the USF burden would impact the long distance industry.

In sum, while Sprint does not object to the Commission's proposed revision of schools and libraries funding levels for the second half of 1998, the Commission should begin now to address root causes, and not just symptoms.

Respectfully submitted,

SPRINT CORPORATION

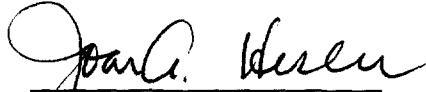


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